

# Proposed Modifications to Draft Photovoltaic Compliance Credit (PVCC)

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# Insulation Industry Trades

- American Chemistry Council's Center for the Polyurethanes Industry (CPI)
- Extruded Polystyrene Foam Association (XPSA)
- North American Insulation Manufacturers Association (NAIMA)
- Polyisocyanurate Insulation Manufacturers Association (PIMA)
- Spray Polyurethane Foam Alliance (SPFA)

# California's Loading Order

- The California Energy Action Plan provides a loading order to address the state's future energy needs.
- The loading order establishes that the state will invest in energy efficiency, like the building envelope, followed by renewable sources.
- Draft PVCC appears contrary to California's loading order.

# #1. Resize Proposed PVCC

- High-Performance Walls (HPWs) and Attics (HPAs) provide long-term energy efficiency benefits for residential homes as CEC has demonstrated.
- **Modification:** Draft PVCC should be resized to limit the allowable tradeoff to either the estimated energy savings from HPWs or HPAs, not both.

## #2. Sunset Final PVCC

- The draft PVCC is intended to provide time for builders to incorporate HPWs and HPAs into designs. But 3 years is too much time. Technologies are available today.
- **Modification**: Sunset any final PVCC to end on January 1, 2018.

# #3. Require HPW/HPA Training

- HPWs and HPAs will be necessary for California to reach 2020 goal of zero net energy homes. Any PVCC should incentivize training, not replace it.
- **Modification:** Any final PVCC should only be available to a builder that has certified completion of a utility funded training HPW/HPA program.

## #4. Require Documentation

- Draft PVCC is intended to allow for hardships facing builders with no experience building HPWs and HPAs. Documenting these hardships will enable the industry to breakdown barriers faster.
- **Modification:** The application for any PVCC should require builders to document the hardship and need for the compliance credit.

## #5. Limit Availability of PVCC

- The insulation industry recognizes that the learning curve for constructing HPWs and HPAs may vary by builder.
- **Modification**: Limit the availability of any PVCC to builders that require additional time/training to effectively incorporate HPWs and HPAs into designs.



## #6. Define PVCC Assumptions

- The insulation industry understands that the proposed PVCC relies on assumptions in order to increase functionality of compliance software tool.
- **Modification:** A complete list of the underlying assumptions should be made available for public review and comment prior to finalizing any PVCC.

# #7. Define PV System Eligibility

- PV systems, like all building products, must be properly installed according to manufacturer and industry recommendations in order to deliver expected performance.
- **Modification**: Any PVCC should set criteria for eligible PV systems, including siting requirements, performance specifications, and ownership requirements.

# HPW/HPA Technology is Here

- The ability to incorporate HPWs and HPAs into residential homes in California today is well documented.
- The expertise to make these construction practices more widely adopted is readily available through design professionals and the insulation industry.